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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

LEAH BULLEN, individually, and on
behalf of other members of the general
public similarly situated,

Plaintiff,

vs.

CITIGROUP GLOBAL MARKETS, INC.,
d/b/a SMITH BARNEY,

Defendant.

Case No. CV 09 4117 (SBA)

**STIPULATED REQUEST FOR ORDER
CHANGING TIME OF INITIAL CASE
MANAGEMENT CONFERENCE AND
ADR DEADLINES; ORDER**

STIPULATION

WHEREAS, the Initial Case Management Conference in the above-captioned case is currently scheduled for December 10, 2009, at 3:00 p.m., via telephone, before the Honorable Sandra B. Armstrong;

WHEREAS, lead counsel representing Plaintiff Leah Bullen ("Plaintiff") and Defendant Citigroup Global Markets, Inc. ("Defendant") have been unable to meaningfully meet and confer pursuant to Federal Rule of Civil Procedure 26(f) and the Court's September 4, 2009 *Order Setting Initial Case Management Conference and ADR Deadlines*; and

WHEREAS, as described in the accompanying Declaration of Megan Borovicka, the parties have agreed to stipulate to continue the Initial Case Management Conference due to lead counsels' inability to meet and confer in accordance with the current case schedule, and have begun discussing a discovery time frame and one set of interrogatories has been served;

NOW, THEREFORE, pursuant to Civil Local Rule 6-2, Plaintiff and Defendant, through their undersigned respective counsel, stipulate and request that the Court continue the current Initial Case Management Conference date of December 10, 2009, and reschedule the Conference for February 25, 2010 or a later date the Court finds appropriate, and to re-set the related pre-Conference deadlines, including the ADR deadlines, accordingly.

1 Dated: _____, 2009

MORGAN, LEWIS & BOCKIUS LLP

2
3 By _____

4 George A. Stohner
5 Daryl S. Landy
6 Megan Barry Borovicka
7 Attorneys for Defendant
8 CITIGROUP GLOBAL MARKETS INC.

9
10 Dated: _____, 2009

INITIATIVE LEGAL GROUP APC

11
12 By _____

13 Robert Byrnes
14 Payam Shahian
15 Sang Park
16 Attorneys for Plaintiff
17 LEAH BULLEN

ORDER

PURSUANT TO THE PARTIES' STIPULATION, IT IS HEREBY ORDERED THAT the Case Management Conference currently scheduled for December 10, 2009, shall be CONTINUED to **February 3, 2010, at 3:00 p.m.** The parties shall **meet and confer** prior to the conference and shall prepare a joint Case Management Conference Statement which shall be filed no later than ten (10) days prior to the Case Management Conference that complies with the Standing Order For All Judges Of The Northern District Of California and the Standing Order of this Court. Plaintiff shall be responsible for filing the statement as well as for arranging the conference call. All parties shall be on the line and shall call (510) 637-3559 at the above indicated date and time.

IT IS FURTHER ORDERED THAT that all related deadlines preceding the Initial Case Management Conference are moved to correspond with the new Conference date.

SO ORDERED.

Dated: 12/8/09


HON. SAUNDRA B. ARMSTRONG
U.S. District Court Judge